

FILED IN OPEN COURT

DATE 9/5/13BY K. T. Olson
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IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION
SEPTEMBER 2013 SESSION

UNITED STATES OF AMERICA)

Criminal No.: 5:13-CR-000 23

v.)

INDICTMENT

ELIN COELLO-ORDONEZ,)

aka. "Ariel" & "Mariano")

Violation:

MARIO RAMIREZ-LARIOS,)

aka. "Tony", "Tono" & "Paisa")

Title 18, U.S.C. § 1594(c)

KEVIN ALAIN COELLO-GALEANO,)

Title 18, U.S.C. § 371

IRIS ZENIT AYUSO-STORER,)

Title 18, U.S.C. § 1591(a)(1) and (a)(2)

aka. "Tacha")

*Title 8, U.S.C. § 1324(a)(1)(A)(i)**Title 18, U.S.C. § 2422(a)**Title 18, U.S.C. § 2421***COUNT ONE**

The Grand Jury charges that:

1. From on or about November 2010 to on or about August 19, 2011, in the Western Judicial District of Virginia and elsewhere, the defendants ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano" and IRIS ZENIT AYUSO-STORER aka. "Tacha", together with others, did knowingly conspire to recruit, entice, harbor, transport, provide, obtain and maintain by any means, a person, to wit: Jane Doe #1, whose identity is known to the Grand Jury, in and affecting interstate and foreign commerce, and benefit financially from participation in a venture engaged in such acts, knowing and in reckless disregard of the fact that: 1) means of force, threats of force, fraud and coercion, as described in Title 18, United States Code, Section 1591 (e)(2), and a combination of such means, would be used to cause Jane Doe #1 to engage in a commercial

sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(a)(2).

2. All in violation of Title 18, United States Code, Section 1594(c).

COUNT TWO

The Grand Jury further charges that:

1. The Allegations contained in Counts Five through Seventeen of this Indictment are realleged and incorporated by reference into this Count Two.

2. From on or about November 2010 to on or about August 19, 2011, in the Western Judicial District of Virginia, and elsewhere, the defendants ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano", MARIO RAMIREZ-LARIOS, aka. "Tony", "Tono" & "Paiza", KEVIN ALAIN COELLO-GALEANO, IRIS ZENIT AYUSO-STORER aka. "Tacha", willfully, knowingly and unlawfully combined, conspired, confederated and agreed with each other and with other persons known and unknown to the Grand Jury, and did aid and abet each other in so doing, to commit the following federal offense: to knowingly persuade, induce, entice or coerce individuals to travel in interstate commerce to engage in prostitution, in violation of Title 18, United States Code, Section and 2422 (a); and to knowingly transport an individual in interstate commerce, with the intent that such individual engage in prostitution, in violation of Title 18, United States Code, Section and 2421.

The Manner and Means of the Conspiracy

1. It was part of the conspiracy that the defendants ELIN COELLO-ORDONEZ, MARIO RAMIREZ-LARIOS, along with their co-conspirators, would recruit various females to work as prostitutes in brothels located within the Western District of Virginia, Maryland, Pennsylvania and elsewhere. The brothels, which catered largely to the Hispanic population, were usually located in apartments or trailers, and operated by the conspirators. The defendants

and their co-conspirators would transport the prostitutes to the brothels, often across state lines, where the prostitutes would work for a one week period. After the conclusion of a week, the prostitutes would be moved to another brothel.

2. It was a further part of the conspiracy that the conspirators would recruit customers for the prostitutes by handing out phony business cards, which contained a telephone contact number. Customers would call the number and the person who answered would direct the customer to the location of the brothel.

3. It was a further part of the conspiracy that customers were charged \$30.00 for fifteen minutes of sex with the prostitute. A "doorman" would normally work at the brothels, collecting the money from customers and delivering it to the defendant and his co-conspirators. Once the customer paid, the doorman would hand him a checker, poker chip or playing card to give to the prostitute as evidence of payment. The prostitutes averaged anywhere from 20-35 customers a day.

Overt Acts in Furtherance of the Conspiracy

1. At a time unknown to the Grand Jury, but on or around December 2010, defendant ELIN COELLO-ORDONEZ, drove Jane Doe #1 from Harrisonburg, Virginia to Maryland to work as a prostitute.

2. At a time unknown to the Grand Jury, but on or around December 2010, an unknown co-conspirator picked up Jane Doe #1 in Maryland and drove her to an apartment in Harrisburg, Pennsylvania where she worked as a prostitute.

3. At a time unknown to the Grand Jury, but on or around December 2010, defendant ELIN COELLO-ORDONEZ, picked up Jane Doe #1 in Harrisburg, Pennsylvania, after she had worked as a prostitute for one week, and drove her back to Harrisonburg, Virginia.

While driving back to Virginia, Jane Doe #1 gave defendant ELIN COELLO-ORDONEZ an envelope full of U.S. currency, which had been given to her by defendant IRIS Z. AYUSO. The money represented COELLO-ORDONEZ's percentage of Jane Doe #1's earnings that week. Jane Doe#1 was not permitted to keep any money.

4. At a time unknown to the Grand Jury, but on or around January 2011, defendant ELIN COELLO-ORDONEZ, drove Jane Doe #1 from Harrisonburg, Virginia to Maryland to work as a prostitute.

5. At a time unknown to the Grand Jury, but on or around January 2011, defendant IRIS ZENIT AYUSO-STORER, picked up Jane Doe #1 in Maryland and drove her to an apartment in Harrisburg, Pennsylvania where she worked as a prostitute for approximately one week.

6 At a time unknown to the Grand Jury, but on or around January 2011, an unknown female named "Maria" picked up Jane Doe #1 from the apartment in Harrisburg, Pennsylvania and drove her to a house in Scranton, Pennsylvania where Jane Doe #1 worked as a prostitute for approximately one week.

7. At a time unknown to the Grand Jury, but on or around January 2011, defendant ELIN COELLO-ORDONEZ, picked up Jane Doe #1 in Scranton, Pennsylvania, after she had worked as a prostitute for several weeks, and drove her back to Harrisonburg, Virginia.

8. At a time unknown to the Grand Jury, but on or around February 2011, defendant ELIN COELLO-ORDONEZ, picked up Jane Doe #2 in Maryland and drove her to a trailer located at 901 North Liberty Street in Harrisonburg, Virginia to work as a prostitute for approximately one week. After a week, defendant ELIN COELLO-ORDONEZ drove Jane Doe #2 back to Maryland.

9. At a time unknown to the Grand Jury, but on or around mid- March 2011, defendant ELIN COELLO-ORDONEZ, drove to Washington D.C. to pick up unindicted co-conspirator 1 who was to work as a “doorman” at a brothel in Charlottesville, Virginia. Defendant ELIN COELLO-ORDONEZ and unindicted co-conspirator 1 drove to the brothel, located at 1430 Wilton Farms Road, Apartment 2 in Charlottesville, Virginia. Defendant ELIN COELLO-ORDONEZ dropped unindicted co-conspirator 1 at the brothel where he subsequently worked as a doorman until his arrest on April 1, 2011.

10. On or about March 27, 2011, defendant ELIN COELLO-ORDONEZ, drove to Maryland and picked up Jane Doe #2 and drove her to the brothel, located at 1430 Wilton Farms Road, Apartment #2 in Charlottesville, Virginia, where she worked as a prostitute until her arrest on April 1, 2011.

11. On or about April 1, 2011, police arrested unindicted co-conspirator 1 and Jane Doe #2 at 1430 Wilton Farms Road, Apartment #2 in Charlottesville, Virginia for prostitution and pandering. Police recovered playing cards, hundreds of phony business cards, condoms, lubricant and adult DVD's. Police also recovered a document which listed defendant ELIN COELLO-ORDONEZ and his cellular phone number.

12. On or about April 4, 2011, defendant ELIN COELLO-ORDONEZ, drove Jane Doe #1 from Harrisonburg, Virginia to a brothel located at 1403 Merrimac Drive, Apartment #102, Hyattsville, Maryland to work as a prostitute.

13. On or about April 5, 2011, police arrested Jane Doe #1 and defendant KEVIN ALAIN COELLO-GALEANO, at the brothel located at 1403 Merrimac Drive, Apartment #102#, Hyattsville, Maryland. Jane Doe #1 was working as a prostitute while KEVIN ALAIN COELLO-GALEANO worked as a doorman for the brothel.

14. At a time unknown to the Grand Jury, but between on or about April 5, 2011 and August 15, 2011, defendant ELIN COELLO-ORDONEZ, drove Jane Doe #1 from Harrisonburg, Virginia to Harrisburg, Pennsylvania to work as a prostitute at the apartment of defendant IRIS ZENIT AYUSO-STORER.

15. On or about August 15, 2011, defendant MARIO RAMIREZ-LARIOS, drove to Washington D.C. and picked up Jane Doe #3 and drove her to the brothel, located at 793 North Liberty Street, in Harrisonburg, Virginia, where she worked as a prostitute.

16. On or about August 19, 2011, police arrested Jane Doe #3 at 793 North Liberty Street, in Harrisonburg, Virginia for prostitution.

All in violation of Title 18, United States Code, Sections 371 and 2.

COUNT THREE

The Grand Jury charges that:

1. From on or about August 14, 2010 to on or about July 15, 2011, within the Western District of Virginia and elsewhere, defendant ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano", did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe #1, whose identity is known to the Grand Jury, in and affecting interstate and foreign commerce, and benefit financially from participation in a venture engaged in such acts, knowing and in reckless disregard of the fact that: 1) means of force, threats of force, fraud and coercion, as described in Title 18, United States Code, Section 1591 (e)(2), and a combination of such means, would be used to cause Jane Doe #1 to engage in a commercial sex act.

2. All in violation of Title 18, United States Code, Sections 1591(a)(1) , 1591(a)(2) and 1591 (b)(1).

COUNT FOUR

The Grand Jury further charges that:

1. On or about August 14, 2010, within the Western District of Virginia and elsewhere, the defendant ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano," did knowingly encourage and induce Jane Doe #1, an alien, to come to, enter and reside in the United States, in reckless disregard of the fact that such coming to, entry and residence in the United States was in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv).

2. The defendant ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano," committed the acts as set forth in Paragraph One for the purpose of commercial advantage or private financial gain, in violation of Title 8, United States Code, Section 1324 (a)(1)(B)(i).

COUNT FIVE

The Grand Jury further charges that:

Sometime on or about December 2010, within the Western District of Virginia and elsewhere, the defendant ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano", did knowingly persuade, induce, entice or coerce an individual to wit: Jane Doe #1, whose identity is known to the Grand Jury ,to travel in interstate commerce to engage in prostitution, or did aid and abet in the commission of said offense, in violation of Title 18, United States Code, Sections 2 and 2422 (a).

COUNT SIX

The Grand Jury further charges that:

Sometime on or about December 2010, within the Western District of Virginia and elsewhere, the defendant ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano", did knowingly transport an individual, to wit: Jane Doe #1, whose identity is known to the Grand Jury, in interstate commerce from Virginia to Maryland, with the intent that such individual engage in prostitution, or did aid and abet in the commission of said offense, in violation of Title 18, United States Code, Sections 2 and 2421.

COUNT SEVEN

The Grand Jury further charges that:

Sometime on or about January 2011, within the Western District of Virginia and elsewhere, the defendant ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano", did knowingly persuade, induce, entice or coerce an individual to wit: Jane Doe #1, whose identity is known to the Grand Jury, to travel in interstate commerce from Virginia to Maryland, to engage in prostitution, or did aid and abet in the commission of said offense, in violation of Title 18, United States Code, Sections 2 and 2422 (a).

COUNT EIGHT

The Grand Jury further charges that:

Sometime on or about January 2011, within the Western District of Virginia and elsewhere, the defendant ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano", did knowingly transport an individual, to wit: Jane Doe #1, whose identity is known to the Grand Jury, in interstate commerce from Virginia to Maryland, with the intent that such individual

engage in prostitution, or did aid and abet in the commission of said offense, in violation of Title 18, United States Code, Sections 2 and 2421.

COUNT NINE

The Grand Jury further charges that:

Sometime on or about January 2011, within the Western District of Virginia and elsewhere, the defendant IRIS ZENIT AYUSO-STORER, aka. "Tacha", did knowingly transport an individual, to wit: Jane Doe #1, whose identity is known to the Grand Jury, in interstate commerce from Virginia through Maryland to Pennsylvania, with the intent that such individual engage in prostitution, or did aid and abet in the commission of said offense, in violation of Title 18, United States Code, Sections 2 and 2421.

COUNT TEN

The Grand Jury further charges that:

Sometime on or about February 2011, within the Western District of Virginia and elsewhere, the defendant ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano", did knowingly persuade, induce, entice or coerce an individual to wit: Jane Doe #2, whose identity is known to the Grand Jury, to travel in interstate commerce from Maryland to Virginia, to engage in prostitution, or did aid and abet in the commission of said offense, in violation of Title 18, United States Code, Sections 2 and 2422 (a).

COUNT ELEVEN

The Grand Jury further charges that:

Sometime on or about February 2011, within the Western District of Virginia and elsewhere, the defendant ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano", did knowingly transport an individual, to wit: Jane Doe #2, whose identity is known to the Grand Jury, in interstate commerce from Maryland to Virginia, with the intent that such individual engage in prostitution, or did aid and abet in the commission of said offense, in violation of Title 18, United States Code, Sections 2 and 2421.

COUNT TWELVE

The Grand Jury further charges that:

On or about March 27, 2011, within the Western District of Virginia and elsewhere, the defendant ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano", did knowingly persuade, induce, entice or coerce an individual to wit: Jane Doe #2, whose identity is known to the Grand Jury, to travel in interstate commerce from Maryland to Virginia, to engage in prostitution, or did aid and abet in the commission of said offense, in violation of Title 18, United States Code, Sections 2 and 2422 (a).

COUNT THIRTEEN

The Grand Jury further charges that:

On or about March 27, 2011, within the Western District of Virginia and elsewhere, the defendant ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano", did knowingly transport an individual, to wit: Jane Doe #2, whose identity is known to the Grand Jury, in interstate commerce from Maryland to Virginia, with the intent that such individual engage in prostitution,

or did aid and abet in the commission of said offense, in violation of Title 18, United States Code, Sections 2 and 2421.

COUNT FOURTEEN

The Grand Jury further charges that:

On or about April 4, 2011, within the Western District of Virginia and elsewhere, the defendant ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano", did knowingly persuade, induce, entice or coerce an individual to wit: Jane Doe #1, whose identity is known to the Grand Jury, to travel in interstate commerce from Virginia to Maryland, to engage in prostitution, or did aid and abet in the commission of said offense, in violation of Title 18, United States Code, Sections 2 and 2422 (a).

COUNT FIFTEEN

The Grand Jury further charges that:

On or about April 4, 2011, within the Western District of Virginia and elsewhere, the defendant ELIN COELLO-ORDONEZ, aka. "Ariel" and "Mariano", did knowingly transport an individual, to wit: Jane Doe #1, whose identity is known to the Grand Jury, in interstate commerce from Virginia to Maryland, with the intent that such individual engage in prostitution, or did aid and abet in the commission of said offense, in violation of Title 18, United States Code, Sections 2 and 2421.

COUNT SIXTEEN

The Grand Jury further charges that:

On or about August 15, 2011, within the Western District of Virginia and elsewhere, the defendant MARIO RAMIREZ-LARIOS, aka. "Tony", "Tono" & "Paisa", did knowingly persuade, induce, entice or coerce an individual to wit: Jane Doe #3, whose identity is known to

the Grand Jury, to travel in interstate commerce from Washington D.C. to Virginia, to engage in prostitution, or did aid and abet in the commission of said offense, in violation of Title 18, United States Code, Sections 2 and 2422 (a).

COUNT SEVENTEEN

The Grand Jury further charges that:

On or about August 15 2011, within the Western District of Virginia and elsewhere, the defendant MARIO RAMIREZ-LARIOS, aka. "Tony", "Tono" & "Paisa", did knowingly transport an individual, to wit: Jane Doe #3, whose identity is known to the Grand Jury, in interstate commerce from Washington D.C. to Virginia, with the intent that such individual engage in prostitution, or did aid and abet in the commission of said offense, in violation of Title 18, United States Code, Sections 2 and 2421.

A TRUE BILL, this 5th day of September, 2013.


TIMOTHY J. HEAPHY
UNITED STATES ATTORNEY


FOREPERSON